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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

-----)
IN RE: NATIONAL PRESCRIPTION)
OPIATE LITIGATION) Case No. 1:17-MD-2804
-----) Hon. Dan A. Polster
APPLIES TO ALL CASES)
-----)

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The videotaped deposition of EDWARD
BRATTON, called for examination, taken pursuant to the
Federal Rules of Civil Procedure of the United States
District Courts pertaining to the taking of
depositions, taken before JULIANA F. ZAJICEK, a
Registered Professional Reporter and a Certified
Shorthand Reporter, at Bartlit Beck Herman Palenchar &
Scott, LLP, Suite 400, 54 West Hubbard Street,
Chicago, Illinois, on November 30, 2018, at 9:05 a.m.

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3 (Pages 6 to 9)

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1 You see in the first sentence, sir, that
 2 it identifies "orders of controlled substances,"
 3 correct?
 4 A. Correct.
 5 Q. Do you have an understanding that -- that
 6 this section is referring to a system designed to
 7 identify suspicious orders as opposed to suspicious
 8 shipments?
 9 MR. HILL: Object to the form.
 10 BY THE WITNESS:
 11 A. It -- it appears that way, yeah.
 12 BY MR. MOUGEY:
 13 Q. And if you look at the next sentence:
 14 "The registrant shall inform the field
 15 division office of the administration in his area of
 16 suspicious orders when discovered by the registrant."
 17 Do you see that, sir?
 18 A. Yes.
 19 Q. And "when discovered by the registrant,"
 20 do you have an understanding of what timeframe that
 21 means?
 22 MR. HILL: Objection to the form.
 23 BY THE WITNESS:
 24 A. I -- I don't know what they mean by

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1 "The registrant shall design and operate a
 2 system to disclose to the registrant suspicious orders
 3 of controlled substances."
 4 Did I read that first sentence right?
 5 A. Yes.
 6 Q. Now, as an employee of Walgreens, do you
 7 believe that Walgreens had a system designed to
 8 identify suspicious orders of controlled substances?
 9 MR. HILL: Object to the form.
 10 BY THE WITNESS:
 11 A. At -- at what time?
 12 BY MR. MOUGEY:
 13 Q. From the time you began in pharmaceutical
 14 integrity.
 15 A. From the time I began, yes.
 16 Q. All right. Do you believe that Walgreens
 17 had a system in place designed to identify suspicious
 18 orders of controlled substances prior to you starting
 19 at pharmaceutical -- or in pharmaceutical integrity?
 20 MR. HILL: Ob- -- objection to the form.
 21 BY THE WITNESS:
 22 A. I don't know.
 23 BY MR. MOUGEY:
 24 Q. You don't know.

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1 discovered.
 2 BY MR. MOUGEY:
 3 Q. Well, do you have an understanding or how
 4 did you interpret that when -- what -- when discovered
 5 means?
 6 MR. HILL: Objection to form.
 7 BY THE WITNESS:
 8 A. I don't know. From the -- I don't know.
 9 BY MR. MOUGEY:
 10 Q. The third sentence:
 11 "Suspicious orders include orders of
 12 unusual size, orders deviating substantially from a
 13 normal pattern, and orders of unusual frequency."
 14 Do you see that, sir?
 15 A. Yes.
 16 Q. Did I read that correctly?
 17 A. Yes.
 18 Q. And -- and do you understand that that is
 19 Walgreens' responsibility to have a system to identify
 20 orders deviating substantial from the normal pattern
 21 and orders of unusual frequency, correct, sir?
 22 MR. HILL: Objection to the form.
 23 BY THE WITNESS:
 24 A. I -- I don't know. I mean, I see that

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<p style="text-align: right;">Page 50</p> <p>1 that's what that says here.</p> <p>2 BY MR. MOUGEY:</p> <p>3 Q. But no one has ever told you that's the</p> <p>4 responsibility at -- of Walgreens during your tenure</p> <p>5 at Walgreens?</p> <p>6 A. No.</p> <p>7 MR. HILL: Objection.</p> <p>8 Hold on one second. Sorry. I ask you not</p> <p>9 to -- counsel you not to disclose any attorney client</p> <p>10 privileged communication you might have had about that</p> <p>11 subject.</p> <p>12 BY THE WITNESS:</p> <p>13 A. So we -- we rely on our regulatory law</p> <p>14 group to guide us. You know, I'm not an attorney and</p> <p>15 there is a variety of case law and regulations and</p> <p>16 state and federal. So we rely on their guidance on</p> <p>17 how to proceed as it relates to the patchwork of</p> <p>18 regulations that we have to comply with.</p> <p>19 BY MR. MOUGEY:</p> <p>20 Q. Sure.</p> <p>21 And you relied on that regulatory law</p> <p>22 group about the details of the regulatory framework?</p> <p>23 A. Correct.</p> <p>24 Q. And so when you had a question about the</p>	<p style="text-align: right;">Page 52</p> <p>1 Q. How often did you interact on a, say, a</p> <p>2 monthly basis with any lawyers at Walgreens regarding</p> <p>3 the details of the regulatory framework regarding to</p> <p>4 the monitoring -- related to the monitoring of</p> <p>5 controlled substances?</p> <p>6 MR. HILL: And Mr. -- Mr. Bratton, just don't</p> <p>7 disclose any of the actual communications. This is</p> <p>8 just a question about timing and the numbers of</p> <p>9 communications.</p> <p>10 BY THE WITNESS:</p> <p>11 A. I -- I don't recall. At the time I</p> <p>12 started I can tell you that we talked with them</p> <p>13 frequently on a variety of issues. I don't recall</p> <p>14 exactly on this one five years ago how often I spoke</p> <p>15 with them.</p> <p>16 BY MR. MOUGEY:</p> <p>17 Q. In that frequently on a variety of issues</p> <p>18 related to the details of the regulatory framework</p> <p>19 covering controlled -- monitoring of controlled</p> <p>20 substances?</p> <p>21 A. Monitoring of controlled substances,</p> <p>22 reporting of controlled substance loss, controlled</p> <p>23 substance dispensing, et cetera.</p> <p>24 Q. Now, on those details that you talked to</p>
<p style="text-align: right;">Page 51</p> <p>1 details of the regulatory framework, you would contact</p> <p>2 the regulatory law group.</p> <p>3 Does that make sense?</p> <p>4 MR. HILL: Objection to the form.</p> <p>5 BY THE WITNESS:</p> <p>6 A. Correct.</p> <p>7 BY MR. MOUGEY:</p> <p>8 Q. And so part of your training about the</p> <p>9 details of this CFR we just went through, 1301.74, was</p> <p>10 training from the regulatory law group, correct?</p> <p>11 A. I don't know that I would -- training per</p> <p>12 se, but as -- as I started in the role, I know that we</p> <p>13 were trying to report suspicious orders for RDCs.</p> <p>14 Q. I understand. That's not what we are</p> <p>15 talking about right now. What we are talking about is</p> <p>16 your interaction with the regulatory law group and</p> <p>17 details about Section 1301.74.</p> <p>18 Do you see that?</p> <p>19 A. Um-hum.</p> <p>20 Q. So interpretations of what you mentioned</p> <p>21 of the -- I think you used the word "patchwork," case</p> <p>22 law, regs, DEA interpretations, you would rely on the</p> <p>23 regulatory group for those details?</p> <p>24 A. Correct.</p>	<p style="text-align: right;">Page 53</p> <p>1 the regulatory law group about, when you said</p> <p>2 frequently, is that twice a week, twice a day, just</p> <p>3 generally?</p> <p>4 A. Twice a week, probably.</p> <p>5 Q. And that was more in the beginning when</p> <p>6 you started with pharmaceutical integrity?</p> <p>7 A. I think it continues to this day. Maybe</p> <p>8 not on this topic as much.</p> <p>9 Q. So a couple times a week you would</p> <p>10 interact with the regulatory law group about the</p> <p>11 details of Walgreens' control monitoring system?</p> <p>12 A. Or details or specific incidents that</p> <p>13 might arise, et cetera.</p> <p>14 Q. And -- and it's important for you as a</p> <p>15 manager of the southern operation to have an</p> <p>16 understanding of the regulatory framework covering</p> <p>17 Walgreens' responsibilities in relation to monitoring</p> <p>18 of controlled substances, correct?</p> <p>19 MR. HILL: Object to the form.</p> <p>20 BY THE WITNESS:</p> <p>21 A. I -- I think for our group it was</p> <p>22 important to execute the tasks and the -- the -- the</p> <p>23 programs we've been implement -- charged with. I</p> <p>24 don't know that I need to understand the law to</p>

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<p style="text-align: right;">Page 54</p> <p>1 understand what we needed to do. 2 BY MR. MOUGEY: 3 Q. The question I asked you was a little 4 different. What I asked was: Is it important for you 5 as a manager of the southern operation to have an 6 understanding of the regulatory framework covering 7 Walgreens' responsibilities in relation to monitoring 8 of Schedule II and Schedule III opiates? 9 MR. HILL: Object to the form. 10 BY THE WITNESS: 11 A. I -- I don't know how to answer that 12 question. 13 BY MR. MOUGEY: 14 Q. What's confusing to you about that 15 question? Is it important that you understand the 16 regulatory framework? 17 MR. HILL: Same objection. 18 BY THE WITNESS: 19 A. I think I have a general concept, but I 20 don't think I'm an expert on all of the issues at 21 every level of government, no. 22 BY MR. MOUGEY: 23 Q. Yeah, I don't -- I don't think I asked you 24 about whether you were an expert at every level of</p>	<p style="text-align: right;">Page 56</p> <p>1 paragraph in your LinkedIn profile, correct? 2 A. This is copied from my job posting. 3 Q. Yes, sir. So you put this in there, 4 right? 5 A. I copy and pasted, yes. 6 Q. You copied it. And it's accurate, 7 correct? 8 A. I believe so. 9 Q. So Bratton 1, your profile: "Responsible 10 for managing, creating, and maintaining controlled 11 substance dispensing, monitoring and reporting 12 programs." 13 Is that accurate, sir? 14 A. Yes. 15 Q. And that was part of the scope of your 16 responsibilities from February '13 on? 17 A. Correct. 18 Q. Second sentence: 19 "Developed, recommends, implements 20 programs, procedures and techniques which will 21 identify and minimize loss of company assets and 22 ensure the safety, compliance and security of the 23 ordering and dispensing of controlled substances," 24 correct?</p>
<p style="text-align: right;">Page 55</p> <p>1 government. What I asked was is it important as a 2 manager of the southern operation for Walgreens in 3 pharmaceutical integrity to understand, just 4 generally, the regulatory framework covering 5 Walgreens' responsibilities in relation to monitoring 6 Schedule II and Schedule III opiates? 7 MR. HILL: Objection to the form. 8 BY THE WITNESS: 9 A. I'm not sure. 10 BY MR. MOUGEY: 11 Q. Has someone instructed you to -- to say 12 "I'm not sure" to questions about what Walgreens' 13 responsibilities were? 14 A. No. 15 Q. Have you been told just to -- if -- if 16 anyone asks you about what Walgreens' responsibilities 17 were, just to say I'm not sure? 18 A. I'm trying to answer truthfully. 19 Q. Well, let's go back to Bratton 1, okay. 20 Manager of pharmaceutical integrity, 21 southern operation, February 2013 to the present, 22 right? 23 A. Um-hum. 24 Q. Okay. Now, you -- you put this next</p>	<p style="text-align: right;">Page 57</p> <p>1 A. Correct. 2 Q. Now, when you say controlled substances 3 in -- in this paragraph, that is a number of different 4 types of drugs, correct? 5 A. Correct. 6 Q. And you understand that this litigation is 7 about Schedule II and Schedule III opiates, correct, 8 sir? 9 A. Correct. 10 Q. And you understand, sir, in your role as 11 manager of the southern operation that those 12 Schedule II and Schedule III opiates are highly 13 addictive, correct? 14 MR. HILL: Object to the form. 15 BY THE WITNESS: 16 A. My understanding is they can be addictive 17 for some people. 18 BY MR. MOUGEY: 19 Q. Yes, sir, they can be addictive to some 20 people. 21 And did you understand in February 22 of 2013, that the country was in the midst of an 23 opiate crisis? 24 MR. HILL: Object to the form.</p>

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<p style="text-align: right;">Page 58</p> <p>1 BY THE WITNESS:</p> <p>2 A. I believe that I was becoming aware of it,</p> <p>3 yes.</p> <p>4 BY MR. MOUGEY:</p> <p>5 Q. And how did you become aware of that in</p> <p>6 February of 2013?</p> <p>7 A. Partially through my -- my work,</p> <p>8 partially, you know, you -- the news and things you</p> <p>9 see on television.</p> <p>10 Q. Well, let's talk about the partially</p> <p>11 because of your work.</p> <p>12 How at work did you become aware that in</p> <p>13 2013 the country was in the middle of an opiate</p> <p>14 crisis?</p> <p>15 A. I don't recall the specific details. I</p> <p>16 know that we -- it was something that was, you know,</p> <p>17 in our minds as we were drafting our policies and</p> <p>18 procedures.</p> <p>19 Q. It was in your mind.</p> <p>20 Help -- help me to understand how it got</p> <p>21 in your mind?</p> <p>22 A. Direction from my boss --</p> <p>23 Q. Ms. Polster?</p> <p>24 A. Yes.</p>	<p style="text-align: right;">Page 60</p> <p>1 BY MR. MOUGEY:</p> <p>2 Q. You don't recall. You don't recall</p> <p>3 walking in the first month of my job and somebody</p> <p>4 saying, We are in the middle of an opiate crisis,</p> <p>5 people are dying every day, Florida is the hot bed,</p> <p>6 you are in charge of the southern operation, there is</p> <p>7 drugs migrating up to Ohio, and it is our job as</p> <p>8 distributors to monitor and identify controlled</p> <p>9 substances?</p> <p>10 Anything along those lines?</p> <p>11 MR. HILL: Objection to the form.</p> <p>12 BY THE WITNESS:</p> <p>13 A. I don't recall.</p> <p>14 BY MR. MOUGEY:</p> <p>15 Q. Anything saying this is -- this is very,</p> <p>16 very, very important that we are on the front line of</p> <p>17 defense for Walgreens and we dispense as -- as many --</p> <p>18 or more opiates than anyone in the country?</p> <p>19 A. I don't recall.</p> <p>20 Q. You don't recall any meetings with a sense</p> <p>21 of urgency like that?</p> <p>22 A. I -- when I first was in the role, we were</p> <p>23 very focused on the settlement with the DEA and the</p> <p>24 provisions that our legal teams had outlined that we</p>
<p style="text-align: right;">Page 59</p> <p>1 Q. And when you say "direction," what do you</p> <p>2 mean?</p> <p>3 A. We would meet in meetings with our -- my</p> <p>4 peers or our team members and discuss issues and she</p> <p>5 would provide direction as to programs we should work</p> <p>6 on.</p> <p>7 Q. Did anybody ever tell you that there had</p> <p>8 been ongoing congressional investigations into the</p> <p>9 opiate crisis almost 13 years by the time you started</p> <p>10 in 2013?</p> <p>11 A. No.</p> <p>12 Q. Did anybody tell you that there was year</p> <p>13 upon year upon year increase in the amount of opiates</p> <p>14 dispensed across the country?</p> <p>15 A. I knew that. I don't know that anyone at</p> <p>16 work told me that.</p> <p>17 Q. Did anyone ever as part of your training</p> <p>18 advise you that the amount of deaths had increased,</p> <p>19 overdose deaths related to Schedule II and</p> <p>20 Schedule III opiates had increased exponentially</p> <p>21 beginning in late '90s, early 2000s?</p> <p>22 MR. HILL: Objection to the form.</p> <p>23 BY THE WITNESS:</p> <p>24 A. I don't recall.</p>	<p style="text-align: right;">Page 61</p> <p>1 needed to implement. That was one of the critical</p> <p>2 focuses at that time.</p> <p>3 Q. And the -- in the midst of the</p> <p>4 investigations by the DEA, what are you referring to?</p> <p>5 A. The -- when I was there, it was the</p> <p>6 settlement agreement that we had signed and so we</p> <p>7 received a laundry list of -- of tasks and programs</p> <p>8 and changes that we were working to implement.</p> <p>9 Q. And that was in -- the agreement was</p> <p>10 signed.</p> <p>11 Do you have a recollection of when the</p> <p>12 agreement was signed?</p> <p>13 A. Shortly after I started.</p> <p>14 Q. Like in June of 2013?</p> <p>15 A. That sounds right.</p> <p>16 Q. Were -- did anyone alert you or notify you</p> <p>17 from your date in February of '13 until the date the</p> <p>18 agreement was signed about the ongoing investigations?</p> <p>19 A. We were in discussions about the terms of</p> <p>20 the settlement and what that might include. Some of</p> <p>21 the things that the government had already outlined</p> <p>22 that we had committed to.</p> <p>23 Q. Including the closing of six Walgreens'</p> <p>24 stores in Florida, correct?</p>

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<p style="text-align: right;">Page 62</p> <p>1 MR. HILL: Objection to the form.</p> <p>2 BY THE WITNESS:</p> <p>3 A. I don't know if I knew that at that time.</p> <p>4 BY MR. MOUGEY:</p> <p>5 Q. Including these -- the requirement that</p> <p>6 six Walgreens' pharmacies were no longer dispensing</p> <p>7 Schedule II and Schedule III narcotics?</p> <p>8 A. That was included in the eventual</p> <p>9 settlement, but I don't know if I knew that that was a</p> <p>10 condition at that time.</p> <p>11 Q. Were you a -- are you aware that there was</p> <p>12 a -- a distribution center in Jupiter, Florida,</p> <p>13 correct?</p> <p>14 A. I -- once I was in this role, yes.</p> <p>15 Q. As of February of 2013, were -- were you</p> <p>16 aware that that Jupiter distribution center was part</p> <p>17 of the investigation?</p> <p>18 A. I knew that they were no longer dispensing</p> <p>19 and that there had been an order to show cause.</p> <p>20 Q. So let's go back to Branton -- I'm</p> <p>21 sorry -- Branton 2.</p> <p>22 You have a general understanding that</p> <p>23 Walgreens is charged with implementing a system</p> <p>24 designed to identify suspicious orders, correct?</p>	<p style="text-align: right;">Page 64</p> <p>1 Q. And orders of unusual frequency?</p> <p>2 A. Correct.</p> <p>3 Q. Do you have an understanding in February</p> <p>4 of 2013 what Walgreens had been doing to perform due</p> <p>5 diligence once an order had been identified as</p> <p>6 suspicious?</p> <p>7 MR. HILL: Objection to the form.</p> <p>8 BY THE WITNESS:</p> <p>9 A. As of the implementation of the CSOM or</p> <p>10 before that?</p> <p>11 BY MR. MOUGEY:</p> <p>12 Q. Let's start with that.</p> <p>13 From October of 2012 until February of '13</p> <p>14 when you started at pharmaceutical integrity, do you</p> <p>15 have an understanding of what Walgreens was doing to</p> <p>16 perform due diligence on suspicious orders?</p> <p>17 A. I believe so, yes.</p> <p>18 Q. And what was that understanding?</p> <p>19 A. So, if the -- we established a -- a</p> <p>20 ceiling and tolerance for each product at each</p> <p>21 location and if an order was attempted to be placed by</p> <p>22 a store that exceeded that, we would then investigate</p> <p>23 why that order was placed, and if it was deemed to be</p> <p>24 suspicious, we would report it to the DEA. Also, if</p>
<p style="text-align: right;">Page 63</p> <p>1 A. General --</p> <p>2 MR. HILL: Object to the form.</p> <p>3 BY THE WITNESS:</p> <p>4 A. Generally, yes.</p> <p>5 BY MR. MOUGEY:</p> <p>6 Q. Do you have an understanding that -- a</p> <p>7 general understanding that Walgreens was required to</p> <p>8 report suspicious orders to the DEA?</p> <p>9 MR. HILL: Same objection.</p> <p>10 BY THE WITNESS:</p> <p>11 A. Generally, yes.</p> <p>12 BY MR. MOUGEY:</p> <p>13 Q. And that suspicious orders include orders</p> <p>14 of unusual size, correct?</p> <p>15 MR. HILL: Objection to the form.</p> <p>16 BY THE WITNESS:</p> <p>17 A. Yes.</p> <p>18 BY MR. MOUGEY:</p> <p>19 Q. Orders deviating substantially from a</p> <p>20 norther -- normal pattern?</p> <p>21 MR. HILL: Same objection.</p> <p>22 BY MR. MOUGEY:</p> <p>23 Q. Correct?</p> <p>24 A. Correct.</p>	<p style="text-align: right;">Page 65</p> <p>1 the store did not reply, we would report it to the</p> <p>2 DEA.</p> <p>3 Q. Do you have an understanding where that</p> <p>4 due diligence, beginning in October of '12 on, was</p> <p>5 kept or stored once performed by Walgreens?</p> <p>6 MR. HILL: Ob- -- objection to the form.</p> <p>7 BY THE WITNESS:</p> <p>8 A. Some of it is kept in the notes in the</p> <p>9 CSOM system, some of it might also be in e-mail or --</p> <p>10 or the steps we took to investigate?</p> <p>11 BY MR. MOUGEY:</p> <p>12 Q. Yes, sir.</p> <p>13 A. Yeah, they might be e-mails or phone calls</p> <p>14 that were conducted or notes that were placed in the</p> <p>15 CSOM system.</p> <p>16 Q. If it's not in the CSO -- CSOM system,</p> <p>17 where was the memorialization of those notes or phone</p> <p>18 calls from the investigation, you called it?</p> <p>19 MR. HILL: Ob- -- objection to the form.</p> <p>20 BY THE WITNESS:</p> <p>21 A. On -- I don't know. I mean, it could</p> <p>22 be -- as I said, it could be in an e-mail, it could be</p> <p>23 in discussions that we had, but I don't know that</p> <p>24 if -- if we didn't document it in that system, I don't</p>

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<p style="text-align: right;">Page 66</p> <p>1 know where else we would have documented it. But that</p> <p>2 doesn't necessarily mean it didn't occur.</p> <p>3 BY MR. MOUGEY:</p> <p>4 Q. Do you have a general understanding of the</p> <p>5 suspicious order monitoring policies in place at</p> <p>6 Walgreens prior to the CSOM in October of 2012?</p> <p>7 A. Not really.</p> <p>8 Q. Not really or -- or none?</p> <p>9 MR. HILL: Objection to form, asked and</p> <p>10 answered.</p> <p>11 BY THE WITNESS:</p> <p>12 A. Very little understanding prior to the --</p> <p>13 2012.</p> <p>14 BY MR. MOUGEY:</p> <p>15 Q. Ex- -- explain to me what you understood</p> <p>16 was in place prior to the CSOM policy in October</p> <p>17 of 2012?</p> <p>18 A. I know that there were reports that were</p> <p>19 generated and sent. I don't know the criteria for how</p> <p>20 those were produced. I know that DC staff would look</p> <p>21 at orders, but I don't know what order criteria they</p> <p>22 used to -- to look at those orders.</p> <p>23 Q. When you say orders were generated and</p> <p>24 sent, sent to whom?</p>	<p style="text-align: right;">Page 68</p> <p>1 Q. And do you know when Eric Stahmann</p> <p>2 started?</p> <p>3 A. I don't. I -- it was a few months, I</p> <p>4 think, before me.</p> <p>5 Q. A month or two before you?</p> <p>6 A. I don't know the exact timeframe. I know</p> <p>7 it was shortly before I did. In that --</p> <p>8 Q. Did Ms. -- go ahead.</p> <p>9 A. In that role.</p> <p>10 Q. Was Ms. Daugherty part of that role of</p> <p>11 developing and -- the system to identify suspicious</p> <p>12 orders?</p> <p>13 A. I don't know. I think she may have</p> <p>14 started after me, but I don't -- I don't know for</p> <p>15 sure.</p> <p>16 Q. How well do you know Eric Stahmann?</p> <p>17 A. I mean, I've worked with him for some</p> <p>18 number of years. I know him, you know, a medium</p> <p>19 amount, I guess, I don't know.</p> <p>20 Q. There's four managers in pharmaceutical</p> <p>21 integrity, correct?</p> <p>22 A. Well, there are three managers and then</p> <p>23 our -- our boss, so...</p> <p>24 Q. And at inception in early '13, there were</p>
<p style="text-align: right;">Page 67</p> <p>1 A. I believe DEA field offices.</p> <p>2 Q. But you are not sure?</p> <p>3 A. I'm not sure.</p> <p>4 Q. Who would know?</p> <p>5 A. Denny Murray from our inventory team, I</p> <p>6 believe, or Barb Martin. Probably. I believe. I</p> <p>7 don't know. Maybe others on those teams.</p> <p>8 Q. Well, when you started in -- in February</p> <p>9 of '13 in pharmaceutical integrity and your charge was</p> <p>10 creating a system for identifying suspicious orders,</p> <p>11 did you go back and look at what history -- Walgreens</p> <p>12 had done historically?</p> <p>13 A. There had already been a substantial</p> <p>14 amount of effort put into the new system. It was</p> <p>15 already up and running before I started, so I did not,</p> <p>16 no.</p> <p>17 Q. It was up and running by February of '13?</p> <p>18 A. Yes.</p> <p>19 Q. And who had done that substantial amount</p> <p>20 of work before you got there?</p> <p>21 A. I think that would be Tasha, I know Eric</p> <p>22 started before I did, Eric Stahmann. Again, probably</p> <p>23 Denny Murray, John Merritello, and Wayne Bancroft from</p> <p>24 inventory teams.</p>	<p style="text-align: right;">Page 69</p> <p>1 four, correct?</p> <p>2 A. Ah, correct, yes, I take that back.</p> <p>3 Q. And Mr. Stahmann is one of those -- one of</p> <p>4 those managers, whether it is three or four, correct?</p> <p>5 A. Correct.</p> <p>6 Q. And -- and you are one of those managers,</p> <p>7 whether it is three or four, correct?</p> <p>8 A. Correct.</p> <p>9 Q. And both of you are responsible for</p> <p>10 different geographic parts of the country, correct?</p> <p>11 A. Correct.</p> <p>12 Q. You all interact regularly, I would</p> <p>13 assume, in your roles in pharmaceutical integrity,</p> <p>14 correct?</p> <p>15 A. Yes.</p> <p>16 Q. You sit in meetings with him regularly,</p> <p>17 correct?</p> <p>18 A. Correct.</p> <p>19 Q. You -- you talk about policies and</p> <p>20 procedures in those meetings, correct?</p> <p>21 A. Correct.</p> <p>22 Q. You talk about once those reports are</p> <p>23 generated that you all perform investigations as a</p> <p>24 result, correct?</p>

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